

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE: : CHAPTER 7
Garnet Stacey Pinnock, :
 :
Debtor. : CASE NO: 18-71216-SMS

NOTICE OF HEARING

PLEASE TAKE NOTICE that Garnet Stacey Pinnock, Debtor, has filed a **Motion to Reopen** and related papers seeking an order reopening the Chapter 7 case.

PLEASE TAKE FURTHER NOTICE that the Court will hold a hearing on the **Motion to Reopen** in Courtroom 1201, United States Courthouse, 75 Ted Turner Drive, SW, Atlanta, Georgia, 30303, at 10:30 A. M. on Wednesday, January 13, 2021.

****Given the current public health crisis, hearing may be telephonic only. Please check the "Important Information Regarding Court Operations During COVID-19 Outbreak" tab at the top of the GANB Website prior to the hearing for instructions on whether to appear in person or by phone.**

Your rights may be affected by the court's ruling on these pleadings. You should read these pleadings carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.) If you do not want the court to grant the relief sought in these pleadings or if you want the court to consider your views, then you and/or your attorney must attend the hearing. You may also file a written response to the pleading with the Clerk at the address stated below, but you are not required to do so. If you file a written response, you must attach a certificate stating when, how and on whom (including addresses) you served the response. Mail or deliver your response so that it is received by the Clerk at least two business days before the hearing. The address of the Clerk's Office is: Clerk, U. S. Bankruptcy Court, Suite 1340, 75 Ted Turner Drive, S.W., Atlanta Georgia 30303. You must also mail a copy of your response to the undersigned at the address stated below.

DATED: December 30, 2020.

THE CARSON FIRM, LLC

/s/ Nicole Carson

Nicole Carson

Attorney for Debtor

Georgia Bar No. 722305

The Carson Firm, LLC

400 Galleria Pkwy, #1500

Atlanta, Georgia 30339

Phone: (404) 782-2347

Fax: (678) 288-7866

Email: nicole@bk-attorneys.com

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MOTION TO REOPEN

COMES NOW, Garnet Stacey Pinnock, Debtor, by and through Debtor's attorney, Nicole Carson and moves this Honorable Court to reopen the bankruptcy case, and in support thereof states as follows:

1.

Debtors filed a petition for relief pursuant to Chapter 7 Title 11 U.S.C on December 19, 2018.

2.

A meeting of creditors pursuant to Section 341 was held and concluded on February 19, 2019.

3.

Neither the Trustee nor any creditors filed any complaints to discharge, or to determine dischargeability of certain debts on or before the respective deadlines to file the same.

4.

The Debtor received a standard discharge on April 1, 2019.

5.

Debtor has discovered the existence of one or more judicial lien(s) filed in Dekalb County Magistrate Court which impair certain exemptions claimed in the bankruptcy petition. The judicial lien(s) need to be avoided or declared void to protect Debtor's interests in real property and to allow her to sell, modify, or refinance her residence.

WHEREFORE, Garnet Stacey Pinnock, the Debtor, prays this Honorable Court for the following relief:

- A. that this Motion to Reopen be granted;
- B. for such other and further relief this court deems just and proper.

DATED: December 30, 2020

Respectfully submitted,
THE CARSON FIRM, LLC

/s/ Nicole Carson
Nicole Carson
Attorney for Debtor
Georgia Bar No. 722305
The Carson Firm, LLC
400 Galleria Pkwy, #1500
Atlanta, Georgia 30339
Phone: (404) 782-2347
Fax: (678) 288-7866
Email: nicole@bk-attorneys.com

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CERTIFICATE OF SERVICE

I, Nicole Carson, hereby certify, under penalty of perjury, that I am more than eighteen (18) years of age, and that on this day I served a copy of the within ***Notice of Hearing and Motion to Reopen*** upon the following parties listed below, and to all those parties listed on the attached matrix, by depositing a copy of same in the United States Mail with sufficient postage thereon to ensure delivery to:

Garnet Stacey Pinnock
PO Box 361735
Decatur, GA 30036

S. Gregory Hays
Hays Financial Consulting, LLC
Suite 555
2964 Peachtree Road
Atlanta, GA 30305

Office of the United States Trustee
362 Richard Russell Building
75 Ted Turner Drive, SW
Atlanta, GA 30303

This 30th day of December, 2020.

/s/ Nicole Carson
Nicole Carson GABN 722305
Attorney for Debtor
The Carson Firm, LLC
400 Galleria Pkwy, #1500
Atlanta, Georgia 30339
Phone: (404) 782-2347
Fax: (678) 288-7866
Email: nicole@bk-attorneys.com

Label Matrix for local noticing
113E-1
Case 18-71216-sms
Northern District of Georgia
Atlanta
Wed Dec 30 22:52:56 EST 2020

(p)BMW FINANCIAL SERVICES
CUSTOMER SERVICE CENTER
PO BOX 3608
DUBLIN OH 43016-0306

(p)JPMORGAN CHASE BANK N A
BANKRUPTCY MAIL INTAKE TEAM
700 KANSAS LANE FLOOR 01
MONROE LA 71203-4774

Collectron Of Atlanta
Carter-Young
Attn: Bankruptcy
PO Box 92269
Atlanta, GA 30314-0269

Credit First National Assoc
Attn: Bankruptcy
PO Box 81315
Cleveland, OH 44181-0315

DHI Mortgage Company
Attn: Bankruptcy
10700 Pecan Park Blvd
Ste 450
Austin, TX 78750-1481

S. Gregory Hays
Hays Financial Consulting, LLC
Suite 555
2964 Peachtree Road
Atlanta, GA 30305-4909

Jared/Sterling Jewelers
375 Ghent Rd
Fairlawn, OH 44333-4601

MOHELA/Debt of Ed
Attn: Bankruptcy
633 Spirit Dr
Chesterfield, MO 63005-1243

Office of the United States Trustee
362 Richard Russell Building
75 Ted Turner Drive, SW
Atlanta, GA 30303-3315

Amex
Correspondence/Bankruptcy
PO Box 981540
El Paso, TX 79998-1540

Capital One
Attn: Bankruptcy
PO Box 30285
Salt Lake City, UT 84130-0285

Elizabeth Childers
Shapiro, Pendergast and Hasty
Suite 300
211 Perimeter Center Parkway, NE
Atlanta, GA 30346-1305

Comenitybank/New York
Attn: Bankruptcy Dept
PO Box 182125
Columbus, OH 43218-2125

Credit One Bank
Attn: Bankruptcy
PO Box 98873
Las Vegas, NV 89193-8873

Everhome Mortgage Co
Ever Bank
Attn: Bankruptcy Dept
301 West Bay Street
Jacksonville, FL 32202-5180

Germani Gabrielle Hunt
Sissac Legal Group P.C.
6595 Roswell Rd., Ste. G
PMB 90656
Atlanta, GA 30328-3152

Jared/Sterling Jewelers
Attn: Bankruptcy
PO Box 3680
Akron, OH 44309-3680

Richard B. Maner
Richard B. Maner, P.C.
Suite 200
180 Interstate N Parkway
Atlanta, GA 30339-2106

PRA Receivables Mgmt
PO Box 41021
Norfolk, VA 23541-1021

BMW Bank of North America
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

Nicole Carson
The Carson Firm
#1500
400 Galleria Parkway
Atlanta, GA 30339-5953

Citicard
General Correspondence
PO Box 6500
Sioux Falls, SD 57117-6500

Comenitybank/jared
PO Box 182789
Columbus, OH 43218-2789

(p)THE CREDIT UNION LOAN SOURCE LLC
10800 ALPHARETTA HWY STE 208 759
ROSWELL GA 30076-1490

First Fin Investment Fund V
DeKalb Medical Center
3100 Breckinridge Blvd #722
Duluth, GA 30096-4985

(p)INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
PHILADELPHIA PA 19101-7346

LendingClub
Attn: Bankruptcy
71 Stevenson St
Suite 1000
San Francisco, CA 94105-2967

Navient
Attn: Bankruptcy
PO Box 9000
Wiles-Barr, PA 18773-9000

Garnet Stacey Pinnock
PO Box 361735
Decatur, GA 30036-1735

Prosper Funding
221 Main Street
Suite 300
San Francisco, CA 94105-1909

Roy D. Reagin Jr.
3100 Breckinridge Bl #722
Duluth, GA 30096-4985

Select Portfolio Servicing
Attn: Bankruptcy
PO Box 65250
Salt Lake City, UT 84165-0250

Sterling Jewelers
Attn: Bankruptcy
PO Box 1799
Akron, OH 44309-1799

Syncb/ccsycc
Attn: Bankruptcy
PO Box 965060
Orlando, FL 32896-5060

Synchrony Bank
c/o PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

Synchrony Bank/Care Credit
Attn: Bankruptcy Dept
PO Box 965061
Orlando, FL 32896-5061

Synchrony Bank/Gap
Attn: Bankruptcy Dept
PO Box 965060
Orlando, FL 32896-5060

Synchrony Bank/Walmart
Attn: Bankruptcy Dept
PO Box 965060
Orlando, FL 32896-5060

Target
Target Card Services
Mail Stop NCB-0461
Minneapolis, MN 55440

US Dept of Education
Attn: Bankruptcy
PO Box 16448
Saint Paul, MN 55116-0448

United States Attorney
Northern District of Georgia
75 Ted Turner Drive SW
Suite 600
Atlanta GA 30303-3309

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

BMW Financial Services
Attn: Bankruptcy Dept
PO Box 3608
Dublin, OH 43016

Chase Card Services
Correspondence Dept
PO Box 15298
Wilmington, DE 19850

(d)Chase Mortgage
Mail Code: OH4-7302
PO Box 24696
Columbus, OH 43224

Credit Union Loan Source
Attn: Bankruptcy
PO Box 105388
Atlanta, GA 30348

IRS
Attn: Bankruptcy
PO Box 21126
Philadelphia, PA 19114

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)HSBC Bank USA, National Association

(u)SELECT PORTFOLIO SERVICING, INC

End of Label Matrix	
Mailable recipients	41
Bypassed recipients	2
Total	43